

THE REIS LAW FIRM, A.P.C.
Sean P. Reis (Cal. State Bar #184044)
30021 Tomas Street, Suite 300
Rancho Santa Margarita, CA 92688
Phone: (949) 459-2140
Fax: (949) 459-2123
sreis@reisfirm.com
(Admitted *Pro Hac Vice*)

Attorneys for Victoria L. Gunvalson and Woo Hoo Productions, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT WILLIAMSON, III, an individual,

Plaintiff,

vs.

VICTORIA L. GUNVALSON, an individual; DAVID
BROOKS AYERS, an individual,

Defendants.

BASE CASE NO.:
2:13-cv-01019-JAD-GWF

MEMBER CASE NO.:
2:13-cv-02022-JAD-GWF

(Honorable Jennifer A. Dorsey)

**STATUS CONFERENCE
STATEMENT OF VICTORIA L.
GUNVALSON AND WOO HOO
PRODUCTIONS, LLC;**

**AND ADMINISTRATIVE REQUEST
FOR PERMISSION TO ALLOW
COUNSEL TO APPEAR AT STATUS
CONFERENCE BY COURTCALL**

Date: October 24, 2016
Time: 3:00 p.m.
Courtroom: 6D

AND RELATED CROSS-ACTIONS

STATUS CONFERENCE STATEMENT

Victoria L. Gunvalson (“Gunvalson”) and Woo Hoo Productions, LLC (“Woo Hoo”) jointly submit this status conference statement in preparation for the status conference on October 24, 2016 at 3:00 p.m. in Department 6D:

1. Status Of Claims By Robert Williamson Against Gunvalson and Woo Hoo

Robert Williamson (“Williamson”) has asserted various claims against Gunvalson in the Base Case, and against Gunvalson and Woo Hoo in the Member Case.

Gunvalson and Woo Hoo assert that Robert Williamson no longer possesses authority to pursue his claims in either the Base Case or Member Case because Williamson is currently in Chapter 13 Bankruptcy in the United States Bankruptcy Court for the District of Arizona (Case No. 2:16-bk-00788-EPB).¹ Based on his bankruptcy filing, Williamson’s claims against Gunvalson and Woo Hoo now belong to the Bankruptcy Trustee (on behalf of Williamson’s creditors), and not Williamson.

Gunvalson and Woo Hoo are unaware of any action taken by the Bankruptcy Trustee to retain counsel to pursue Williamson’s claims. Thus, at the moment, Williamson’s claims are not being prosecuted because Williamson has no authority to pursue the claims himself. In fact, Gunvalson and Woo Hoo expect the Bankruptcy Trustee to refrain from pursuing Williamson’s claims against Gunvalson and Woo Hoo altogether, as Gunvalson is the largest unsecured creditor listed by Williamson in his bankruptcy schedules (the Court may recall that David Brooks Ayers (“Ayers”) was awarded a judgment for attorneys’ fees against Williamson in this action, after which Ayers assigned that judgment to Gunvalson).

2. Status Of Claims By Gunvalson Against Williamson

As set forth above, Williamson has filed for bankruptcy protection. Accordingly, Gunvalson’s claims against Williamson are automatically stayed during the pendency of Williamson’s bankruptcy proceeding.

¹ Cross-Defendant Cate Wakem-Williamson (“C. Williamson”) also filed for Chapter 13 Bankruptcy in Arizona (Case No. 2:15-bk-15653-PS). C. Williamson and Williamson have moved to consolidate their bankruptcy cases.

ADMINISTRATIVE REQUEST FOR PERMISSION TO APPEAR BY COURTCALL

Counsel for Gunvalson and Woo Hoo respectfully requests permission from the Court to appear at the Status Conference by Courtcall. Counsel expects the status conference to proceed relatively quickly based on the procedural issues set forth above. Permission to appear at the status conference by Courtcall would allow counsel to avoid the travel time and costs associated from traveling from Southern California to Las Vegas for what likely will be a streamlined status conference.

October 10, 2016

THE REIS LAW FIRM, A.P.C.

By: /s/ Sean P. Reis

Sean P. Reis

Attorneys for Victoria L. Gunvalson and Woo
Hoo Productions, LLC

CERTIFICATE OF SERVICE

I, Sean P. Reis, hereby certify that on October 10, 2016, I filed through the Court's ECF system and served either through the ECF system or by electronic mail (per agreement), or by regular mail, the foregoing document(s) described as: **STATUS CONFERENCE STATEMENT OF VICTORIA L. GUNVALSON AND WOO HOO PRODUCTIONS, LLC; AND ADMINISTRATIVE REQUEST FOR PERMISSION TO ALLOW COUNSEL TO APPEAR AT STATUS CONFERENCE BY COURTCALL** on interested parties in this action as follows:

Dean Y. Kajioka, Esq.
(attorneys@kajioklaw.com)
Kajioka & Associates
8530 West Charleston Blvd., Suite 100
Las Vegas, NV 89117

Michael Nicholson
(mike@cjvodka.com)
PO Box 32
Calistoga, CA 94515

Robert Williamson, III
2272 S. McClelland Pl.
Chandler, AZ 85286

Cate-Wakem Williamson
2272 S. McClelland Pl.
Chandler, AZ 85286

David Brooks Ayers
12682 Largo Drive
Fishers, IN 12682

/s/ Sean P. Reis